



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

February 1, 2022

The Honorable Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: United States v. Maximiliano Davila-Perez,
S9 19 Cr. 91 (DLC)

Dear Judge Cote:

The Government writes to provide an update in this matter and to respectfully request unsealing of the above-referenced Superseding Indictment.

On or about September 22, 2020, Maximiliano Davila-Perez ("Davila") was charged in Superseding Indictment S9 19 Cr. 91 (DLC) with (i) conspiring to import five kilograms and more of cocaine into the United States, from at least in or about July 2019 though in or about September 2020, in violation of Title 21, United States Code, Section 963 ("Count One"); and (ii) conspiring to use or carry machineguns during and in relation to, or to possess machineguns in furtherance of, the drug trafficking crime charged in Count One of the Superseding Indictment, in violation of Title 18, United States Code, Section 924(o) ("Count Two").

Davila was previously the Director of Bolivia's chief anti-narcotics law enforcement agency, *Fuerza Especial de Lucha Contra el Narcotráfico* ("FELCN"). As part of the conspiracies charged in the Superseding Indictment, Davila exploited his official position at FELCN to secure access to Bolivian airfields for cocaine transport and to arrange for members of Bolivian law enforcement under his command—including individuals armed with machineguns—to provide protection for those drug loads. DAVILA-PEREZ also worked in partnership with large-scale cocaine suppliers who operate cocaine labs in Bolivia, and agreed to ship more than a thousand kilograms of Bolivian cocaine to New York.

The Superseding Indictment was filed under seal. The Government understands that the defendant was recently detained in Bolivia and we are seeking Davila's extradition to the United


States. Accordingly, the Government respectfully requests that Superseding Indictment S9 19 Cr. 91 (DLC) be unsealed.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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SO ORDERED:

 2/1/22
HONORABLE DENISE L. COTE
United States District Judge
Southern District of New York